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5 Napa, California 94559  
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7 Facsimile: (707) 252-8516

8 Attorneys for Claimant  
9 Glenn Gary Baker

10 UNITED STATES BANKRUPTCY COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 **In re:**

14 **PG&E CORPORATION,**

15 **- and -**

16 **PACIFIC GAS AND ELECTRIC**  
17 **COMPANY,**

18 Debtors.

- 19 ☐ Affects PG&E Corporation  
20 ☐ Affects Pacific Gas and Electric Company  
21 ☒ Affects both Debtors

22 *\*All papers shall be filed in the Lead Case, No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF PATRICK  
FEISTEL IN SUPPORT OF CLAIMANT  
GLENN GARY BAKER'S RESPONSE  
TO REORGANIZED DEBTORS'  
FORTY-FOURTH OMNIBUS  
OBJECTION TO CLAIMS (NO  
LIABILITY / PASSTHROUGH  
CLAIMS)**

**Response Deadline: December 1, 2020**

**Hearing Information If Timely Response  
Made:**

Date: December 15, 2020

Time: 10 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

23 I, Patrick Feistel, declare:

24 1. I am the Property Manager for Glenn Gary Baker, Claimant in the above-referenced  
25 action and have personal knowledge of the information provided in this Declaration.

26 2. Due to the fires started by PG&E, we had damage and losses to Claimant Glenn Gary  
27 Baker's property, located at 6210 Dry Creek Road, Napa, California (hereinafter "Property").  
28

1           3. The fire destroyed the water tanks, lines, piping, and attachments. The water lines are  
2 over a mile and a quarter from the spring to the house. The cost for new water tanks, lines, piping,  
3 and attachments totaled \$10,503.21; attached hereto as Exhibit A are true and correct copies of  
4 invoices from American Tank Company and Wyatt Irrigation Company for the new water tanks,  
5 lines, piping, and attachments. To install the new water tanks, lines, piping, and attachments required  
6 360 labor hours at \$25 per hour, for a total cost of \$9,000.

7           4. The fire also destroyed approximately 75% of the two miles of cattle fencing on the  
8 Property. The materials to replace the cattle fencing included: 30 rolls of barbed wire at \$89.99/roll  
9 (\$2,699.70), 750 T posts at \$4.49 a piece (\$3,367.50), 75 wooden posts at \$10.99 a piece (\$824.25).  
10 The total materials cost was \$6,891.45 plus tax \$499.63 = \$7,391.08. The total cost of labor to repair  
11 the cattle fencing destroyed by the fire was \$7,500 (approximately 300 hours for installation at  
12 \$25/hour).

13           5. The fire further destroyed approximately 40 trees that required removal. Attached as  
14 Exhibit B are photos I took of trees on the Property that were burned and killed by the fire. We have  
15 removed approximately 20 trees thus far, but the rest of the dead trees still need to be removed. We  
16 utilized the services of Pacific Tree Care to help remove the burned trees at a total cost of \$2,000  
17 thus far. The value of the destroyed trees is to be determined by an arborist.

18           6. After the fire, PG&E entered the Property without permission and cut down five old  
19 growth Redwood trees, the largest measuring five feet in diameter. The Redwood trees were located  
20 near the top of the Property near the spring, nowhere near the power lines. After cutting down the  
21 trees, PG&E left all of the logs and debris at the location and never hauled it away. Attached as  
22 Exhibit C is a photo I took of the large Redwood tree that PG&E cut down. The value of these trees  
23 is to be determined by an arborist.

24           7. There was additional extensive tree removal by PG&E at the front of the Property, with  
25 over 150 trees cut down, even though some of those trees were over 60 feet away from the power  
26 lines. During this work, PG&E demolished approximately 25% of the two miles of cattle fencing on  
27 the Property with their bulldozers and heavy equipment. Attached as Exhibit D are photos I took of  
28

1 cattle fences on the Property destroyed by PG&E's tree work. The materials to replace the cattle  
2 fencing included: 10 rolls of barbed wire at \$89.99/roll (\$899.90), 250 T posts at \$4.49 a piece  
3 (\$1,112.50), 25 wooden posts at \$10.99 a piece (\$274.75). The total materials cost was \$2,297.15  
4 plus tax \$166.54 = \$2,463.69. The total cost of labor to repair the cattle fencing destroyed by the fire  
5 was \$2,500 (approximately 100 hours for installation at \$25/hour). The value of the trees PG&E cut  
6 down is to be determined by an arborist.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing  
8 is true and correct. Executed at Napa, California, December 1, 2020.

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Patrick Feistel

# EXHIBIT A

# American

TANK COMPANY

Invoice # 101479A

Date 10/05/18

Page 1

SUMMARY COPY

**Bill To**

Pat Feistel  
1195 Mee Lane  
SAINT HELENA, CA 94574

**Ship To**

ATC - Windsor  
501 American Way  
WINDSOR, CA 95492

Customer No.	Sales Person	Reference #	Source	Terms			
44902	SLE/SLE		1 /INTERNET	PRE-PAID BY CHECK			
Ordered By		Warehouse	Phone Number	Total Wt.	Zone	Pkg	Ship Via
			(707) 321-1463	2535.0 Lbs	1	2	WC
ORDER CANCELLATION CHARGES: Processed Orders - 25% Cancellation Charge Shipped Orders - All Sales Final/No Returns or Exchanges							

Qty	B/O	Ship	Item #	Description	Unit Price	Amount
2	0	2	WATER 41375 CAH	Water Storage Tank - Norwesco 5,000 Gal Dark Green Water Tank w/FTG (102"D x 152"H)	2225.07	4450.13
2	0	--	SSF 5000 W	Super Saver Freight Super Saver Freight 5000 Gallon Tank	300.00	600.00
1	0	1	WATER 41375 CAH	Water Storage Tank - Norwesco 5,000 Gal Dark Green Water Tank w/FTG (102"D x 152"H)	2225.07	2225.07
1	0	--	SSF 5000 W	Super Saver Freight Super Saver Freight 5000 Gallon Tank	300.00	300.00

MERCHANDISE INVOICE TOTAL \$ 7575.20  
STATE SALES TAX \$ 549.20  
COUNTY SALES TAX \$ 66.28  
INVOICE TOTAL \$ 8190.68  
CHECK #:3015 \$ -8190.68  
BALANCE FOR THIS ORDER \$ 0.00

Remit To:



A WinWholesale Company

Wyatt Irrigation Co.

747 Yolanda Ave.

Santa Rosa, CA 95404-6325

Page	Date Printed	Invoice No.
1	9/05/18	352922 00

To Reorder Contact Us At

Phone No. : 707-578-3747

Fax No .. : 707-578-3958

DB# 03

Sold To:

Ship To:

WYATT IRRIGATION NAPA  
CASH/CREDIT CARD SALES  
4407 SOLANO AVE  
NAPA, CA 94558-1613

Customer Number	Customer Purchase Order	Salesman	Type Shipment	Ship VIA	Date Shipped
00891-009939		010-HOUSE ACCOUNT	Stock	WILL CALL	9/05/18

THANK YOU FOR YOUR ORDER!

Units Ordered	U/M	Item Description	Units Shipped	B/C	Price	Per	Discount	Extended	Tax
2,000	EA	1 80# UTILITY POLY PIPE PP8010500	2,000		.2251		.00	450.20	T
12	EA	1429-010 1 PVC IXI CPL 1429010	12		1.1197		.00	13.44	T
1	EA	1436-010 1 PVC INS X MIP 1436010	1		1.1177		.00	1.12	T
1	EA	438-335 3X1 S40 SPGXF BUSH 438335	1		3.6217		.00	3.62	T
1	EA	429-030 3" PVC40 COUPLING 429030	1		4.2826		.00	4.28	T
20	EA	TC.5716 57 SERIES HOSE CLAMP SS16	20		1.0900		.00	21.80	T

Terms: Monthly Service Charge May Be Applied To Past Due Accounts.

C.O.D.

Pay full balance by 9/06/18

Tax Area ID:	Net Sales	494.46
CA - 050552220	Freight	.00
State Tax % 6.000	State Tax	29.67
Local Tax % 1.750	Local Tax	8.65
	Invoice Amount	532.78



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When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. For inquiries please call (707) 251-3747.

T&C: You agree that the sale of these products/services is subject to all of our standard terms and conditions of sale located at [www.winwholesale.com/doc/sale](http://www.winwholesale.com/doc/sale).

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INVOICE# : Laser Invoice

Remit To:

**WYATT**<sup>TM</sup>

A WinWholesale Company

Wyatt Irrigation Co.

747 Yolanda Ave.

Santa Rosa, CA 95404-6325

Page	Date Printed	Invoice No.
1	9/25/18	353735 00

To Reorder Contact Us At

Phone No. : 707-578-3747

Fax No .. : 707-578-3958

DB# 17

Sold To:

Ship To:

**WYATT IRRIGATION NAPA**  
**CASH/CREDIT CARD SALES**  
**4407 SOLANO AVE**  
**NAPA, CA 94558-1613**

Customer Number <b>00891-009939</b>	Customer Purchase Order	Salesman <b>010-HOUSE ACCOUNT</b>	Type Shipment <b>Stock</b>	Ship VIA <b>WILL CALL</b>	Date Shipped <b>9/25/18</b>
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**THANK YOU FOR YOUR ORDER!**

Units Ordered	U/M	Item Description	Units Shipped	B/C	Price	Per	Discount	Extended	Tax
1,800	EA	27706 1-1/2 S40 PVC PIPE P4015	1,800		.5400		.00	972.00	T
4	EA	2622-015 1-1/2 SXS PVC BALL VL	4		15.0126		.00	60.05	T
3	EA	401-015 1-1/2" PVC SCH40 TEE 401015	3		1.1910		.00	3.57	T
3	EA	417-015 1-1/2 SCH40 45 DEG ELL 417015	3		1.2958		.00	3.89	T
9	EA	406-015 1-1/2 S40 90 ELL 406015	9		.9079		.00	8.17	T
2	EA	447-015 1-1/2 SLIP PVC40 CAP 447015	2		.6000		.00	1.20	T
16	EA	TC.5712 1/2-1-1/4 SLS CLAMP SS12	16		1.0900		.00	17.44	T
2	EA	1406-010 1 PVC IXI 90 ELL 1406010	2		1.7936		.00	3.59	T
4	EA	1429-010 1 PVC IXI CPL 1429010	4		.8413		.00	3.37	T
1	EA	1436-010 1 PVC INS X MIP 1436010	1		.8348		.00	.83	T
1	EA	1435-010 1 PVC INS X FIP 1435010	1		3.5480		.00	3.55	T
1	EA	PVC17G-030 1QT PVC-17 HVY BDY 1 QT HEAVY BODY GRAY	1		23.2914		.00	23.29	T
1	EA	PRIM70P-030 1QT PRIMER-70 PRP 1 QUART PURPLE PRIMER	1		18.0851		.00	18.09	T

Terms: Monthly Service Charge May Be Applied To Past Due Accounts.

C.O.D.

Pay full balance by 9/26/18

Tax Area ID:	Net Sales	1,119.04
CA - 050552220	Freight	.00
State Tax % 6.000	State Tax	67.14
Local Tax % 1.750	Local Tax	19.59
	Invoice Amount	<b>1,205.77</b>

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Remit To

**WYATT**<sup>TM</sup>

A WinWholesale Company

Wyatt Irrigation Co.

747 Yolanda Ave.

Santa Rosa, CA 95404-6325

Page	Date Printed	Invoice No.
1	9/28/18	353869 00

To Reorder Contact Us At

Phone No. : 707-578-3747

Fax No .. : 707-578-3958

DB# 20

Sold To:

Ship To:

**WYATT IRRIGATION NAPA**  
**CASH/CREDIT CARD SALES**  
**4407 SOLANO AVE**  
**NAPA, CA 94558-1613**

Customer Number	Customer Purchase Order	Salesman	Type Shipment	Ship VIA	Date Shipped
00891-009939		010-HOUSE ACCOUNT	Stock	WILL CALL	9/28/18

THANK YOU FOR YOUR ORDER!

Units Ordered	U/M	Item Description	Units Shipped	B/C	Price	Per	Discount	Extended	Tax
12	EA	436-015 1-1/2 S40 MIP ADPT	12		1.0000		.00	12.00	T
		436015							
2	EA	457-015 11/2 PVC UNION SOCKS	2		13.1935		.00	26.39	T
		457015							
1	EA	437-210 11/2X3/4 S40 S/S BUSH	1		.9283		.00	.93	T
		437210							
1	EA	402-210 1-1/2X3/4 PVC40 SXSXF	1		3.5170		.00	3.52	T
		402210							
1	EA	TA-SW520 3/4 X 520 TEFLON TAPE	1		1.1441		.00	1.14	T
		TT07 3/4 X 520 TEFLON TAPE							
4	EA	759T07 1-1/2 IPS FP BALL VALVE	4		34.0000		.00	136.00	T
		VB15							
1	EA	VP2000 2 RATCHET PIPE CUTTER	1		105.9920		.00	105.99	T
		VICTOR 2 RATCHET PIPE CUTTER							

Terms: Monthly Service Charge May Be Applied To Past Due Accounts.

C.O.D.

Pay full balance by 9/29/18

Tax Area ID:	Net Sales	285.97
CA - 050552220	Freight	.00
State Tax % 6.000	State Tax	17.16
Local Tax % 1.750	Local Tax	5.00
	Invoice Amount	308.13

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A WinWholesale Company

Wyatt Irrigation Co.

747 Yolanda Ave.

Santa Rosa, CA 95404-6325

Page	Date Printed	Invoice No.
1	10/11/18	354331 00

To Reorder Contact Us At

Phone No. : 707-578-3747

Fax No .. : 707-578-3958

DB# 09

Sold To:

Ship To:

**WYATT IRRIGATION NAPA**  
**CASH/CREDIT CARD SALES**  
**4407 SOLANO AVE**  
**NAPA, CA 94558-1613**

Customer Number	Customer Purchase Order	Salesman	Type Shipment	Ship VIA	Date Shipped
00891-009939		010-HOUSE ACCOUNT	Stock	WILL CALL	10/11/18

THANK YOU FOR YOUR ORDER!

Units Ordered	U/M	Item Description	Units Shipped	B/C	Price	Per	Discount	Extended	Tax
3	EA	759T07 1-1/2 IPS FP BALL VALVE VB15	3		39.7968		.00	119.39	T
3	EA	775-080090 1-1/2X3 SCH80 NIP 81503	3		.8373		.00	2.51	T
5	EA	436-015 1-1/2 S40 MIP ADPT 436015	5		.7306		.00	3.65	T
3	EA	439-251 2X1-1/2 PVC40 MXF BSH 439251	3		2.0807		.00	6.24	T
2	EA	457-015 11/2 PVC UNION SOCKS 457015	2		9.6395		.00	19.28	T
1	EA	PVC17G-020 1PT PVC-17 HVY BDY 1 PT HEAVY BODY GRAY	1		14.2715		.00	14.27	T
1	EA	PRIM70P-020 1PT PRIMER-70 PRP 1 PINT PURPLE PRIMER	1		11.1646		.00	11.16	T
2	EA	1436-010 1 PVC INS X MIP 1436010	2		1.0805		.00	2.16	T
2	EA	407-211 1-1/2X1 PVC40 SXF 90 L 407211	2		2.4857		.00	4.97	T
3	EA	1406-010 1 PVC IXI 90 ELL 1406010	3		2.3131		.00	6.94	T
6	EA	429-015 1-1/2 SXS PVC40 COUP 429015	6		.6274		.00	3.76	T
5	EA	436-251 2X1-1/2 SCH 40 M/A 436251	5		2.4383		.00	12.19	T
4	EA	406-015 1-1/2 S40 90 ELL 406015	4		.9803		.00	3.92	T
2	EA	401-015 1-1/2" PVC SCH40 TEE 401015	2		1.2675		.00	2.53	T
2	EA	118-15 11/2 FLOSPAN REPR COUP SF15	2		7.6791		.00	15.36	T
16	EA	TC.5712 1/2-1-1/4 SLS CLAMP SS12	16		1.0900		.00	17.44	T
1	EA	TA-SW520 3/4 X 520 TEFLON TAPE TT07 3/4 X 520 TEFLON TAPE	1		.9629		.00	.96	T

Terms: Monthly Service Charge May Be Applied To Past Due Accounts.

C.O.D.

Pay full balance by 10/12/18

Tax Area ID:	Net Sales	246.73
CA - 050552220	Freight	.00
State Tax % 6.000	State Tax	14.81
Local Tax % 1.750	Local Tax	4.31
	Invoice Amount	265.85

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T&C: You agree that the sale of these products/services is subject to all of our standard terms and conditions of sale located at

www.winwholesale.com/terms

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# EXHIBIT B





















# EXHIBIT C







# EXHIBIT D





